

ATTACHMENT 2

STATE OF INDIANA)	TIPPECANOE COUNTY CIRCUIT COURT I
)	
COUNTY OF TIPPECANOE)	SS: TO THE 2020 TERM
)	
TRACY JEAN DAVIS,)	CAUSE NO. 79C01-2003-CT-
)	
)	
)	
V.)	
)	
CHRISTOPHER WILLIAMS, KOCH)	
COMPANIES, INC. and)	
STAN KOCH & SONS TRUCKING, INC.)	

COMPLAINT

Plaintiff, by counsel, for cause of action states:

General Allegations

- 1) On April 28, 2018, Defendant, Christopher Williams was driving a semi-tractor trailer in Tippecanoe County Indiana. and according to witnesses disregarded the stop sign striking the plaintiff's vehicle at U.S. 231 and County Road 500 S.
- 2) At the time Christopher Williams was employed by Stan Koch & Sons Trucking, Inc. to drive semi-tractor trailers.
- 3) Koch Companies, Inc. owns Stan Koch & Sons Trucking, Inc.

Negligence

- 1) Christopher Williams disregarded a stop sign.
- 2) Christopher Williams failed to keep a proper look-out.
- 3) Christopher Williams struck Tracy J. Davis' vehicle.
- 4) The force of the semi tractor trailer striking the Plaintiff's vehicle required the Plaintiff to be transported to the hospital emergency room for treatment for her injuries.

5) As a direct and proximate result of this negligence, Plaintiff was injured, incurred medical expenses, lost income from work and other damages yet to be ascertained.

WHEREFORE, Plaintiff demands damages from the Defendants in an amount sufficient to compensate her for her losses, for her costs, and all other relief in the premises. Plaintiff demands trial by jury on all issues.

Respectfully submitted,

/s/Susannah M. Hall-Justice
Susannah M. Hall-Justice
Attorney No. 20153-79
Attorney for Tracy Davis
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CERTIFICATE OF SERVICE

I hereby certify that I requested copies of the foregoing be served upon Mr. Christopher Williams, 403 N. I-45 Ennis, TX 75119, Mr. Dave Koch, Koch Companies, Inc., 4370 W Round Lake Rd., Arden Hills, MN 55112, and Mr. Dave Koch, Stan Koch & Sons Trucking, Inc., 4200 Dahlberg Dr., Golden Valley, MN 55421 via certified mail on March 19, 2020.

/s/Susannah M. Hall-Justice
Susannah M. Hall-Justice